

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission  
On Its Own Motion

Investigation Concerning Illinois Bell  
Telephone Company's Compliance with  
Section 271 of the Telecommunications Act  
of 1996

Docket No. 01-0662

**PHASE 1A COMPLIANCE AFFIDAVIT OF  
MARK A. COTTRELL ON BEHALF OF SBC ILLINOIS  
SBC ILLINOIS EXHIBIT 1.1**

Dated: January 22, 2003

## **INTRODUCTION**

I, Mark J. Cottrell, being of lawful age and duly sworn upon my oath, do hereby state as follows:

1. My name is Mark J. Cottrell. My business address is 2000 W. Ameritech Center Drive, Hoffman Estates, Illinois, 60196, Room 4B22. I am Executive Director-Long Distance Compliance-OSS for the Illinois Bell Telephone Company, Incorporated (“SBC Illinois”). In this position, I am responsible for coordinating activities related to SBC Illinois’ compliance with the Federal Communications Commission (“FCC”) and state rules, regulations, and orders relating to nondiscriminatory access to Operations Support Systems (“OSS”). This includes representing SBC Illinois in the Illinois 271 process, and project management of the third-party test of SBC Illinois’ OSS in support of SBC Illinois’ planned application to provide in-region interLATA long distance in Illinois.

## **EDUCATION AND PROFESSIONAL EXPERIENCE**

2. I received a Bachelor of Science degree in 1989 from Eastern Michigan University in Ypsilanti, Michigan, and I am in the final stages of completing my Masters of Science in Information Systems from Lawrence Technological University in Southfield, Michigan. I have nine years of experience in the telecommunications industry and three years with SBC. Over my career, I have held numerous positions in auditing, accounting, finance, and information technology, both at the technical level and senior management level.

### **PURPOSE OF AFFIDAVIT**

3. The purpose of my affidavit is to provide the Commission information regarding SBC Illinois' actions related to Line Loss Notifications, especially as they relate to the Commission Staff recommendations incorporated in the February 6, 2003 ALJ's Phase 1A Interim Order on Investigation in Docket No. 01-0662 ("Interim Order") at para. 694.

### **DISCUSSION**

4. SBC Illinois has addressed all of the remedial actions suggested by the Commission Staff and included in the Interim Order. SBC Illinois has performed an extensive investigation to identify root causes of missing, late or inaccurate line loss notifications, and it has addressed all issues identified to date. SBC Illinois also continues to monitor delivery of line loss notifications, both internally (through its cross-functional team) and externally (through reconciliations and consultation with competing carriers). As a result, SBC Illinois believes that it is providing loss notifications in a reasonable and non-discriminatory manner. Following is a discussion of the individual remedial actions taken by SBC Illinois in response to the suggestions of Commission Staff.

5. *Correct the loss notification issues that SBC/Ameritech acknowledges exist, in Michigan Case No. U-12320, with partial migration of accounts.*

SBC Illinois has corrected the loss notification issues identified in Michigan Case No. U-12320 with partial migration of accounts. All associated software changes were

completed by June 5, 2002. Any notifications prior to that date that were affected by the issue have been corrected and re-sent or “re-flowed” to the appropriate carriers.

6. *Re-train Ameritech Illinois personnel to prevent loss notification problems arising from manual handling errors in the local service centers.*

SBC Illinois developed a formal training package for service representatives on the line loss notification process. This four-hour training package was delivered to over 1,000 service representatives beginning the week of May 26 and completed on July 31, 2002, and included a “military-style” mastery test that required 100% correct answers.

7. *Determine if other situations exists that cause loss notifications to be inaccurate, or untimely, and correct those situations immediately.*

At this time, no such situations are known to exist. The notification process successfully passed BearingPoint’s testing, no current problems have been reported by CLECs, and SBC Illinois’ monitoring of line loss notification processing shows no outstanding issues. SBC Illinois has corrected and will continue to correct any situations that it discovers that cause loss notifications to be inaccurate or untimely.

8. *Clearly state all problems Ameritech Illinois has uncovered related to loss notifications since January 2001 and communicate these situations in an Accessible Letter<sup>1</sup> to the entire CLEC community. The Accessible Letter should also indicate when the problem was first identified, what versions of Ameritech’s software the problem is applicable to,*

*what action Ameritech Illinois has taken if any to correct each issue and when the action was taken, as well as any planned or future action Ameritech Illinois plans to take and an estimate of when the actions will be taken.*

During the course of the Line Loss Notification workshops and follow-up conference calls held from February through June 2002, SBC Illinois provided the industry an extensive amount of information regarding the Line Loss Notification process. These Line Loss Notification workshops and conference calls are discussed in more detail below.

Following the conclusion of the workshops and associated follow-up calls, SBC Illinois instituted a communication process for line loss problems based on the use of Accessible Letter notification. Accessible Letter CLECAM02-400 was distributed on September 24, 2002 to all CLECs in the SBC-Midwest region. The Accessible Letter included the information required by the Staff recommendation, i.e., problem start and end dates, the scope of the problem (who was affected), the corrective action taken and the timing of that action. Also, on November 12 and 13, 2002, SBC Illinois distributed Accessible Letters CLECAM02-122 and CLECAM02-123, which were the initial notification and follow-up related to an incident at that time, and included the required information regarding start and end dates, scope, and corrective action.

9. *On a CLEC-by-CLEC basis, Ameritech Illinois should determine the accounts for which loss notifications have never been sent or were sent incorrectly and communicate these*

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<sup>1</sup> Accessible letters are the primary vehicles by which SBC Illinois communicates matters of general interest to its  
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*instances to the affected CLECs. If problems continue to persist then Ameritech Illinois should be required to perform this reconciliation process on a monthly basis until all issues have been resolved.*

SBC Illinois has performed such reconciliation activities as required. Rather than on a monthly basis, SBC Illinois has engaged in account reconciliation with individual CLECs on a negotiated basis in order to accommodate the business objectives and system capabilities of each CLEC. This has included activities such as resending line loss notifications for past periods, and providing reports of end user account status for comparison with the CLEC's customer database. Information regarding some of the reconciliation activities may be found in the documentation associated with the Line Loss Workshops, e.g., Accessible Letters CLECAM02-170 and CLECAM02-209.

10. *Continue to meet with CLECs, on an as needed basis, to discuss the problems associated with loss notifications and the actions Ameritech Illinois is taking to address the issues.*

SBC Illinois held an initial Line Loss Notification Workshop for interested CLECs on March 13-14, 2002. Follow-up calls were held on April 30, May 17, May 30, and June 28, 2002. No further calls or meetings have been required, but SBC Illinois will arrange further calls as needed to address any new issue affecting multiple CLECs. In addition, SBC Illinois holds monthly OSS Change Management ("CMP") meetings and CLEC User Forum meetings during which process and system issues are raised and discussed. For example, SBC Illinois and CLECs discussed improvements in the communication of loss notification incidents during the October 3, 2002 CMP meeting.

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wholesale customers. They are usually electronic documents sent by electronic mail.

11. *Modify the process Ameritech Illinois uses to notify its retail organization of a customer loss or the process Ameritech Illinois uses to notify its wholesale carriers of a customer loss to bring them into parity with one another.*

In accordance with the Commission's May 2002 order in Docket No. 02-0160, SBC Illinois' retail operations now rely exclusively on the same Line Loss Notifications ("LLN") as those sent to CLECs.

12. *Changes to Performance Measurement MI 13. AI should modify the calculation, business rules and exclusions associated with performance measure MI 13 to accurately capture how long it takes Ameritech Illinois to send a loss notification, and to reflect the fact that MI 13 does not include loss notifications that are never sent. The modifications are as follows:*

- *The calculation should be modified so that the clock starts when the work to disconnect the account from the losing carrier was completed as opposed to the date the service order completion notice was sent to the new carrier.*
- *The business rule should be modified to the following: "The percentage of customer loss notifications sent to carriers where the elapsed time from the completion of the disconnect provisioning work to the time the loss notification (EDI 836 message) is transmitted to the losing carrier is less than one hour".*
- *An additional exclusion should be added to the business rule document to clearly delineate that loss notifications that are not sent by Ameritech Illinois are not included in the measure.*
- *If the time interval is moved to 24 hours (or one calendar day) from one hour as proposed by AI then the benchmark for MI 13 should be increased from 95% to 97%.*
- *Include performance measure MI 13 in the Ameritech Illinois Performance Remedy Plan or whatever plan is determined to be its "Anti-backsliding Plan" as part of this 271 proceeding. A medium weighting should be tied to the measure for remedy purposes. Today, no remedy payments are tied to performance measure MI 13.*

*Any changes Ameritech Illinois makes to its current processes and procedures regarding loss notifications or its performance measures that track loss notifications should be subject to review in Phase 2 of this proceeding.*

SBC Illinois has worked with other industry participants through the Performance Measures six-month review process to make revisions to the Line Loss Notification metric (MI 13), and has reached consensus with CLECs regarding the appropriate modifications. The resulting changes to MI 13, along with all other changes resulting from the six-month review process, will be included in the proposed tariff changes to the performance measurement tariff.

13. *Ameritech's cross-functional team should remain in place and continue to review the line loss notifications until AI provides six months of line loss notices without uncovering any new problems and without any of the old problems re-emerging.*

The SBC Illinois line loss notification cross-functional team continues to monitor the loss notification process on a daily basis. The cross-functional team will be maintained at least until June 30, 2003, at which time it is planned that the monitoring responsibilities of that team would continue but be transitioned to the SBC Illinois organizations responsible for wholesale order processing. SBC Illinois will provide the Commission, for a minimum of six months, a monthly report of any line loss issues that were identified during the month; their cause, duration, scope of loss notifiers affected, and number of providers affected; and actions taken to address those issues.

## **CONCLUSION**

14. SBC Illinois fully recognizes the importance of accurate and timely line loss notifications and has dedicated all necessary resources to address this issue. Specifically, SBC Illinois has addressed all the remedial actions identified by the Commission Staff and included in the ALJ's Interim Order. SBC Illinois will continue to monitor the line loss notification



process, and take appropriate actions in the future if needed to ensure continued accuracy and reliability of line loss notifications. For all these reasons, SBC Illinois is providing line loss notifications in a reasonable and nondiscriminatory manner.

15. This concludes my affidavit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on January \_\_\_\_, 2003

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Your Name: Mark Cottrell

Your Title: Executive Director - OSS

STATE OF ILLINOIS

COUNTY OF COOK

Subscribed and sworn to before me  
this 17th day of January, 2003.

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Notary Public